

# EXHIBIT 13

**Archived:** Monday, July 21, 2025 7:13:40 PM

**From:** [Rodgers, James](#)

**Sent:** Fri, 13 Jun 2025 23:57:28

**To:** [Mackenzie Pensyl Roman](#), [Michael Cohen](#), [Harry mnnavati@snllaw.com](#), [Christopher Jones](#), [Zach Jett](#), [Werner, Rachel Johnson](#), [Dawn Alonzo](#), [Jennifer Vega](#), [Joslin Murphy](#), [Siobhan](#)

**Cc:** [Rodgers, James](#), [Mackenzie Pensyl](#), [Zach Jett](#), [James Chapman](#), [W. Ryan Snow](#), [Mark Nanavati](#), [Tressa Lucas](#), [Mariah Adickes](#), [Breanna Morgan](#)

**Subject:** Re: In re Coeymans Marine Towing, et al. - 06/13 Meet and Confer

**Importance:** Normal

**Sensitivity:** None

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Dear Mackenzie, Jim and Ryan,

At this morning's conference with Siobhan Murphy, the undersigned, and your firm, we most assuredly did not agree to produce another witness on subjects wherein we have interposed an objection.

We stated that we would cover the topics, subject to our objections, on the understanding that 8 would be a factual discussion of the condition of the vessel and the qualifications of the crew.

Please withdraw the misrepresentation of our position forthwith.

We look forward to presenting Mr. Laraway for deposition this coming Tuesday, June 17th.

Regards,  
Jim Rodgers  
Clyde & Co

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**From:** Mackenzie Pensyl <mpensyl@cwm-law.com>

**Sent:** Friday, June 13, 2025 6:22 PM

**To:** Roman, Michael <Michael.Roman@clydeco.us>; Rodgers, James <James.Rodgers@clydeco.us>; Cohen, Harry <Harry.Cohen@clydeco.us>; mnnavati@snllaw.com <mnnavati@snllaw.com>; Christopher Jones <cjones@snllaw.com>; Zach Jett <zjett@butler.legal>; Werner, Rachel <rachel.werner@clydeco.us>; Johnson, Dawn <Dawn.Johnson@clydeco.us>; Alonzo, Jennifer <jennifer.alonzo@clydeco.us>; Vega, Joslin <Joslin.vega@clydeco.us>; Murphy, Siobhan <Siobhan.Murphy@clydeco.us>

**Cc:** James Chapman <jchapman@cwm-law.com>; W. Ryan Snow <wrsnow@cwm-law.com>; Mark Nanavati <mnnavati@snllaw.com>; Zach Jett <zjett@butler.legal>; Mackenzie Pensyl <mpensyl@cwm-law.com>; Tressa Lucas <tucas@cwm-law.com>; Mariah Adickes <madickes@cwm-law.com>; Breanna Morgan <bmorgan@cwm-law.com>

**Subject:** In re Coeymans Marine Towing, et al. - 06/13 Meet and Confer

Good afternoon,

Please see the attached correspondence summarizing today's meet and confer.

Thank you and enjoy your weekend,

Mackenzie

**Mackenzie R. Pensyl, Esquire**

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